

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE * BKRTCY. NO. 14-00427 ESL
CARDONA FRONTERA, JOANNE GLADYS * CHAPTER 13
xxx-xx-8179 *
DEBTOR

**DEBTOR'S NOTICE OF FILING OF AMENDED SCHEDULES "A/B" and "C"
OFFICIAL FORMS 106A/B and 106C**

TO THE HONORABLE COURT:

COMES NOW, JOANNE GLADYS CARDONA FRONTERA, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor is hereby submitting ***Amended Schedules "A/B" and "C"*** dated May 03, 2021, herewith and attached to this motion.
2. The amendment to Schedule "A/B" is filed to **include under Part 4 Item #33, a Debtor's product liability class action injury claim and post-petition settlement for monetary compensation in the gross sum of \$9,000.00, and Schedule "C" is filed to claim the appropriate exemption, in the above captioned case.**

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 1009(b)

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

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Notice of Amended Schedules "A/B" & "C"
Case no. 14-00427 ESL13

CERTIFICATE OF SERVICE

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular US mail to the Debtor and to all creditors and interested parties (CM/ECF non-participants) appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 3rd day of May, 2021.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR the DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699; 787-963-7699
Email: rfc@rfigueroalaw.com

Fill in this information to identify your case and this filing:		
Debtor 1	JOANNE GLADYS CARDONA FRONTERA	
	First Name	Middle Name
Debtor 2 (Spouse, if filing)	Last Name	
	First Name	Middle Name
	Last Name	
United States Bankruptcy Court for the: <u>DISTRICT OF PUERTO RICO, SAN JUAN DIVISION</u>		
Case number	<u>3:14-bk-427</u>	

Check if this is an amended filing

Official Form 106A/B Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

No. Go to Part 2.
 Yes. Where is the property?

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on Schedule G: Executory Contracts and Unexpired Leases.

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

No
 Yes

3.1 Make: Mitsubishi
Model: Outlander 2WD
Year: 2009
Approximate mileage: 136459
Other information:
This vehicle was received (post-petition) as a gift from friend.

Who has an interest in the property? Check one
 Debtor 1 only
 Debtor 2 only
 Debtor 1 and Debtor 2 only
 At least one of the debtors and another
 Check if this is community property
(see instructions)

Do not deduct secured claims or exemptions. Put the amount of any secured claims on Schedule D: Creditors Who Have Claims Secured by Property.

Current value of the entire property? \$6,023.00 Current value of the portion you own? \$6,023.00

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories
Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

No
 Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=> \$6,023.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

Debtor 1 **CARDONA FRONTERA, JOANNE GLADYS**

Case number (if known) **3:14-bk-427**

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

No

Yes. Describe.....

MISC HOUSEHOLD GOODS AND FURNISHINGS

\$5,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

No

Yes. Describe.....

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

No

Yes. Describe.....

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

No

Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

No

Yes. Describe.....

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

No

Yes. Describe.....

CLOTHES AND PERSONAL EFFECTS

\$300.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

No

Yes. Describe.....

13. Non-farm animals

Examples: Dogs, cats, birds, horses

No

Yes. Describe.....

14. Any other personal and household items you did not already list, including any health aids you did not list

No

Yes. Give specific information.....

JEWELRY

\$1,000.00

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$6,300.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the portion you own?

Do not deduct secured claims or exemptions.

Debtor 1 CARDONA FRONTERA, JOANNE GLADYS

Case number (if known) 3:14-bk-427

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

No
 Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

No
 Yes.....

Institution name:

**BANCO POPULAR DE PR
CHECKING ACCOUNT X1519**

17.1. \$68.00

**BANCO POPULAR DE PR
CHECKING ACCOUNT X-2943**

17.2. \$0.00

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

No
 Yes.....

Institution or issuer name:

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

No
 Yes. Give specific information about them.....

Name of entity:

% of ownership:

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

No
 Yes. Give specific information about them

Issuer name:

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

No
 Yes. List each account separately.

Type of account:

Institution name:

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

No
 Yes.

Institution name or individual:

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

No
 Yes.....

Issuer name and description.

24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

No
 Yes.....

Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):

25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit

No
 Yes. Give specific information about them...

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

No
 Yes. Give specific information about them...

Debtor 1 CARDONA FRONTERA, JOANNE GLADYS

Case number (if known) 3:14-bk-427

27. Licenses, franchises, and other general intangibles

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

No

Yes. Give specific information about them...

Money or property owed to you?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

28. Tax refunds owed to you

No

Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. Family support

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

No

Yes. Give specific information.....

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

No

Yes. Give specific information..

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

No

Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

No

Yes. Give specific information..

Debtor owns a 1/5th of 50% hereditary interest in real property located at Santa Elvira Caguas PR and 50% owned by Sucesion Amelia Frontera; other 50% interest is owned by widow Jose Cardone (Debtor's father); total value of this real property is estimated at \$145,000; Debtor's interest is valued at \$12,285.89

\$12,285.69

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

No

Yes. Describe each claim.....

Product Liability Claim: the Debtor is part of a product liability class action in which the Debtor has an individual injury claim for a medical device; on or about 09/20/2019 an aggregate settlement for monetary compensation was reached and the Debtor's compensation is the gross sum of \$9,000.00; as of the date of this disclosure, the Debtor has not received any monetary sum from this action.

\$9,000.00

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

No

Yes. Describe each claim.....

Debtor 1 CARDONA FRONTERA, JOANNE GLADYS

Case number (if known) 3:14-bk-427

35. Any financial assets you did not already list

No
 Yes. Give specific information..

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$21,353.69

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

37. Do you own or have any legal or equitable interest in any business-related property?

No. Go to Part 6.
 Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

No. Go to Part 7.
 Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

No
 Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2	<u>\$0.00</u>
56. Part 2: Total vehicles, line 5	<u>\$6,023.00</u>
57. Part 3: Total personal and household items, line 15	<u>\$6,300.00</u>
58. Part 4: Total financial assets, line 36	<u>\$21,353.69</u>
59. Part 5: Total business-related property, line 45	<u>\$0.00</u>
60. Part 6: Total farm- and fishing-related property, line 52	<u>\$0.00</u>
61. Part 7: Total other property not listed, line 54	<u>\$0.00</u>
62. Total personal property. Add lines 56 through 61...	<u>\$33,676.69</u>
	Copy personal property total
63. Total of all property on Schedule A/B. Add line 55 + line 62	<u>\$33,676.69</u>

Fill in this information to identify your case:			
Debtor 1	JOANNE GLADYS CARDONA FRONTERA		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: <u>DISTRICT OF PUERTO RICO, SAN JUAN DIVISION</u>			
Case number (if known)	<u>3:14-bk-427</u>		

Check if this is an amended filing

Official Form 106C

Schedule C: The Property You Claim as Exempt

4/19

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)
 You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own	Amount of the exemption you claim	Specific laws that allow exemption
Mitsubishi Outlander 2WD 2009 136459 Line from <i>Schedule A/B</i> : 3.1	\$6,023.00	<input checked="" type="checkbox"/> \$3,775.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(2)
Mitsubishi Outlander 2WD 2009 136459 Line from <i>Schedule A/B</i> : 3.1	\$6,023.00	<input checked="" type="checkbox"/> \$814.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(5)
MISC HOUSEHOLD GOODS AND FURNISHINGS Line from <i>Schedule A/B</i> : 6.1	\$5,000.00	<input checked="" type="checkbox"/> \$5,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(3)
CLOTHES AND PERSONAL EFFECTS Line from <i>Schedule A/B</i> : 11.1	\$300.00	<input checked="" type="checkbox"/> \$300.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(3)
JEWELRY Line from <i>Schedule A/B</i> : 14.1	\$1,000.00	<input checked="" type="checkbox"/> \$1,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(4)

Debtor 1	Case number (if known)			3:14-bk-427
Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own	Amount of the exemption you claim	Specific laws that allow exemption	
	Copy the value from Schedule A/B	Check only one box for each exemption.		
Debtor owns a 1/5th of 50% hereditary interest in real property located at Santa Elvira Caguas PR and 50% owned by Sucesion Amelia Frontera; other 50% interest is owned by widow Jose Cardone (Debtor's father); total value of this real property is estimated Line from Schedule A/B: 32.1	\$12,285.69	<input checked="" type="checkbox"/> \$11,850.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(5)	
Debtor owns a 1/5th of 50% hereditary interest in real property located at Santa Elvira Caguas PR and 50% owned by Sucesion Amelia Frontera; other 50% interest is owned by widow Jose Cardone (Debtor's father); total value of this real property is estimated Line from Schedule A/B: 32.1	\$12,285.69	<input checked="" type="checkbox"/> \$435.69 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(5)	
Product Liability Claim: the Debtor is part of a product liability class action in which the Debtor has an individual injury claim for a medical device; on or about 09/20/2019 an aggregate settlement for monetary compensation was reached and the Debtor's c Line from Schedule A/B: 33.1	\$9,000.00	<input checked="" type="checkbox"/> \$9,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 USC § 522(d)(11)(D)	

3. Are you claiming a homestead exemption of more than \$170,350?
(Subject to adjustment on 4/01/22 and every 3 years after that for cases filed on or after the date of adjustment.)

No
 Yes. Did you acquire the property covered by the exemption within 1,215 days before you filed this case?
 No
 Yes

Fill in this information to identify your case:			
Debtor 1	JOANNE GLADYS CARDONA FRONTERA		
	First Name	Middle Name	
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	DISTRICT OF PUERTO RICO, SAN JUAN DIVISION		
Case number (if known)	3:14-bk-427		

Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

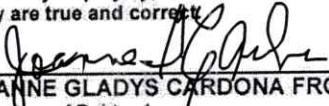
No

Yes. Name of person _____

Attach *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

x


JOANNE GLADYS CARDONA FRONTERA
Signature of Debtor 1

Date May 3, 2021

x

Signature of Debtor 2

Date _____

Label Matrix for local noticing

0104-3

Case 14-00427-ESL13

District of Puerto Rico

Old San Juan

Mon May 3 13:29:23 AST 2021

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

MIDLAND FUNDING LLC BY AMERICAN INFO SOURCE L

ATTN DEPARTMENT 1

PO BOX 4457

HOUSTON, TX 77210-4457

SCOTIABANK DE PUERTO RICO

P O BOX 362230

SAN JUAN, PR 00936-2230

BANCO POPULAR DE PR

209 MUÑOZ RIVERA AVE

SAN JUAN, PR 00918

BC SANTANDER

PO BOX 362589

SAN JUAN, PR 00936-2589

(p) CITIBANK

PO BOX 790034

ST LOUIS MO 63179-0034

BP-CRLINE

PO BOX 2708

SAN JUAN, PR 00936

CAP1/BSTBY

PO BOX 6497

SIOUX FALLS, SD 57117-6497

CAVALRY PORTFOLIO SERV

500 SUMMIT LAKE DR

VALHALIA, NY 10595-2322

CITI

PO BOX 6241

SIOUX FALLS, SD 57117-6241

(p) CITIFINANCIAL

BANKRUPTCY FORECLOSURE UNIT

1000 TECHNOLOGY DRIVE

OFALLOON MO 63368-2222

(p) PUERTO RICO TELEPHONE COMPANY DBA CLARO PR

PO BOX 360998

SAN JUAN PR 00936-0998

Cavalry SPV I, LLC

500 Summit Lake Drive, Ste 400

Valhalla, NY 10595-2321

FED LOAN SERV

PO BOX 69184

Harrisburg, PA 17106-9184

FIRST BANK

PO Box 11868

San Juan, PR 00910-3868

FIRSTBANK PR

PO BOX 982235

EL PASO, TX 79998-2235

FedLoan Servicing

P.O. Box 69184

Harrisburg, PA 17106-9184

GECRB/SAMS CLUB

PO BOX 965005

ORLANDO, FL 32896-5005

IVAN FIGUEROA

HC 1 BOX 5002

JUNCOS, PR 00777-9741

Midland Funding LLC

by American InfoSource LP as agent

ATTN: Department 1

PO Box 4457

Houston, TX 77210-4457

PR ACQUISITIONS LLC

PO BOX 194499

SAN JUAN PR 00919-4499

SANTANDER FINANCIAL

PO BOX 71504

SAN JUAN, PR 00936-8604

SCOTIABANK DE PUERTO RICO

ISMAEL H. HERRERO III, ESQ

P O BOX 362159

SAN JUAN PR 00936-2159

SCOTIABANK OF PR

PO BOX 362649

SAN JUAN, PR 00936-2649

SEARS/CBNA

PO BOX 6189

SIOUX FALLS, SD 57117-6189

ALEJANDRO OLIVERAS RIVERA

ALEJANDRO OLIVERAS CHAPTER 13 TRUS

PO BOX 9024062

SAN JUAN, PR 00902-4062

JOANNE GLADYS CARDONA FRONTERA

CALLE PADRE DE LAS CASAS

URB EL VEDADO

SAN JUAN, PR 00918

MONSITA LECAROZ ARIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO

PO BOX 186

CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

BEST BUY
PO BOX 183195
COLUMBUS, OH 43218-3195

CITIFINANCIAL
300 SAINT PAUL PL
BALTIMORE, MD 21202

CLARO
PO BOX 360998
SAN JUAN, PR 00936

End of Label Matrix
Mailable recipients 29
Bypassed recipients 0
Total 29